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14 SAMSUNG SDI BRASIL LTDA.,
SHENZHEN SAMSUNG SDI CO., LTD. and
15 TIANJIN SAMSUNG SDI CO., LTD.

16 UNITED STATES DISTRICT COURT
17
18 NORTHERN DISTRICT OF CALIFORNIA
19
20 SAN FRANCISCO DIVISION

20 IN RE: CATHODE RAY TUBE (CRT)
21 ANTITRUST LITIGATION

Case No. 07-5944 SC

MDL No. 1917

22 This Document Relates to:

23 *Alfred H. Siegel, as Trustee of the Circuit City*
Stores, Inc. Liquidating Trust v. Hitachi, Ltd.,
24 *et al.*, No. 11-cv-05502;

25 *CompuCom Systems, Inc. v. Hitachi, Ltd., et*
al., No. 11-cv-06396;

26 *Costco Wholesale Corporation v. Hitachi,*
27 *Ltd., et al.*, No. 11-cv-06397;

28 *Dell Inc. and Dell Products L.P., v. Hitachi,*

**DECLARATION OF JAMES L.
MCGINNIS IN SUPPORT OF SDI
DEFENDANTS' REPLY IN SUPPORT OF
THEIR MOTION TO EXCLUDE EXPERT
TESTIMONY OF DR. STEPHAN
HAGGARD**

1 *Ltd., et al*, No. 13-cv-02171;
2 *Electrograph Systems, Inc. and Electrograph*
3 *Technologies Corp., v. Hitachi, Ltd., et al.*,
4 *No. 11-cv-01656*;
5 *Interbond Corporation of America v. Hitachi,*
6 *Ltd., et al.*, No. 11-cv-06275;
7 *Office Depot, Inc. v. Hitachi Ltd., et al.*, No.
8 *11-cv-06276*;
9 *P.C. Richard & Son Long Island Corp., Marta*
10 *Coooperative of Am., Inc., ABC Appliance,*
11 *Inc. v. Hitachi, Ltd., et al.*, No. 12-cv-02648;
12 *Schultze Agency Services, LLC, on behalf of*
13 *Tweeter Opco, LLC and Tweeter Newco, LLC*
14 *v. Hitachi, Ltd., et al.*, No. 12-cv-02649;
15 *Sears, Roebuck and Co. and Kmart Corp. v.*
16 *Chunghwa Picture Tubes, Ltd., et al.*, No. 11-
17 *cv-05514*;
18 *Target Corp. v. Chunghwa Picture Tubes,*
19 *Ltd., et al.*, No. 11-cv-05514;
20 *Tech Data Corp and Tech Data Product*
21 *Management, Inc., v. Hitachi, Ltd., et al.*, No.
22 *13-cv-00157*;
23 *ViewSonic Corp. v. Chunghwa Picture Tubes,*
24 *Ltd., et al.*, No. 14-02510..

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EXHIBITS SUBMITTED UNDER SEAL

1 I, James L. McGinnis, declare as follows:

2 1. I am a partner at the law firm of Sheppard Mullin Richter & Hampton LLP, counsel
3 of record for defendants Defendants Samsung SDI America, Inc.; Samsung SDI Co., Ltd.;
4 Samsung SDI (Malaysia) SDN. Bhd.; Samsung SDI Mexico S.A. De C.V.; Samsung SDI Brasil
5 Ltda.; Shenzhen Samsung SDI Co., Ltd.; and Tianjin Samsung SDI Co., Ltd. (collectively, "SDI").
6 I submit this declaration in support of SDI's Reply Brief in Support of Their Motion to Exclude
7 Expert Testimony of Dr. Stephan Haggard ("Reply"). I have personal knowledge of the facts
8 herein set forth and, if called as a witness, I could and would competently testify thereto.

9 2. Attached hereto as Exhibit A is a true and correct copy of Dr. Haggard's "SDI
10 Personnel Profiles 1998-2007 Workbook," which was originally included as supporting material
11 to the April 15, 2014 expert report of Dr. Haggard.

12 3. Attached hereto as Exhibit B is a true and correct copy of Dr. Haggard's "SDI-SEC
13 Long Term Supply Contract, 1998-2001 Workbook," which was originally included as supporting
14 material to the April 15, 2014 expert report of Dr. Haggard.

15 4. Attached hereto as Exhibit C is a true and correct copy of Supplemental
16 Attachment A to Certain Direct Action Plaintiffs' Responses to Various Interrogatories, dated
17 September 5, 2014.

18
19 I declare under penalty of perjury under the laws of the United States of America
20 that the foregoing is true and correct.

21 Executed this 9th day of February 2015 in San Francisco, California.

22
23 /s/ James L. McGinnis

24 James L. McGinnis
25
26
27
28

EXHIBIT A

[SUBMITTED UNDER SEAL]

EXHIBIT B

[SUBMITTED UNDER SEAL]

EXHIBIT C

[SUBMITTED UNDER SEAL]